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ANN BAVENDER*
 JOHN C. BUTCHER*
 HARRY F. COLE
 ANNE GOODWIN CRUMP
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 LEE G. PETRO*
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 MICHAEL W. RICHARDS*
 JAMES P. RILEY
 KATHLEEN VICTORY
 HOWARD M. WEISS

* NOT ADMITTED IN VIRGINIA

FLETCHER, HEALD & HILDRETH, P.L.C.

ATTORNEYS AT LAW

11th FLOOR, 1300 NORTH 17th STREET

ARLINGTON, VIRGINIA 22209-3801

OFFICE: (703) 812-0400

FAX: (703) 812-0486

www.fhhlaw.com

RETIRED MEMBERS
 RICHARD HILDRETH
 GEORGE PETRUTSAS

CONSULTANT FOR INTERNATIONAL AND
 INTERGOVERNMENTAL AFFAIRS
 SHELDON J. KRYSS
 U. S. AMBASSADOR (ret.)

OF COUNSEL
 DONALD J. EVANS
 FRANCISCO R. MONTERO
 EDWARD S. O'NEILL*
 ROBERT M. GURSS*
 EUGENE M. LAWSON, JR.

WRITER'S DIRECT

(703) 812-0424

quianzon@fhhlaw.com

August 4, 2005

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Federal Communications Commission
 Office of Secretary

Via Hand Delivery

Marlene H. Dortch, Secretary
 Federal Communications Commission
 445 12th Street, S.W.
 Washington, D.C. 20554

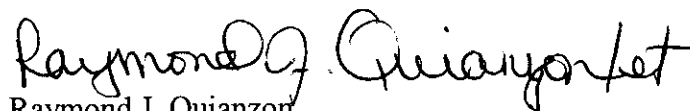
Re: *ex parte* presentation in Docket No. 96-45
 Iowa rural cellular partnerships

Madame Secretary:

On August 3, 2005, the undersigned counsel, on behalf of RSA 7 Limited Partnership, Iowa 9 - Monona Limited Partnership, and Iowa RSA 10 General Partnership met with Narda Jones, Chief of the Telecommunications Access Policy Division of the Wireline Competition Bureau, Mark Seifert, Assistant Chief of the Telecommunications Access Policy Division of the Wireline Competition Bureau and several members of the Federal Communications Commission staff. At such meeting, a written presentation - - two copies of which are attached - - was provided to Commission personnel and a discussion was had regarding the contents of the Petition for Declaratory Ruling filed on July 1, 2005, in the above captioned docket.

Any questions regarding the *ex parte* presentation may be directed to the undersigned.

Yours very truly,



Raymond J. Quianzon
 Counsel to RSA 7 Limited Partnership, Iowa
 9 - Monona Limited Partnership, and Iowa
 RSA 10 General Partnership

cc: Narda Jones (by electronic delivery)
 Mark Seifert (by electronic delivery)
 Pam Slipakoff (by electronic delivery)
 Carol Pomponio (by electronic delivery)
 Thomas Buckley (by electronic delivery)

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Section 214(e)(5) is clear on its face:

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The term "service area" means a geographic area established by a State commission (or the Commission under paragraph (6)) for the purpose of determining universal service obligations and support mechanisms.

In deference to the body of knowledge developed by the Commission for rural telephone companies, Section 214(e)(5) continues by specifying that for these rural telephone companies (emphasis added):

In the case of an area served by a rural telephone company. "service area" means such company's "study area" unless and until the Commission and the States, after taking into account recommendations of a Federal-State Joint Board instituted under section 410(c), establish a different definition of service area for such company.

Recent Commission and Wireline Competition Bureau decisions on ETC status of wireless carriers are given jurisdiction under Section 214(e)(6). Such is not the instant case as the State commission has made its determination pursuant to Section 214(e)(5).